

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

GREGORY RUTH,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO: 3:06-CV-1137-WKW-TFM
)	
THE CADLE COMPANY)	
)	
Defendant.)	

PLAINTIFF'S FIRST INTERROGATORIES TO DEFENDANT

Comes now the Plaintiff in the above-styled matter by and through undersigned counsel of record and pursuant to the Federal Rules of Civil Procedure requires Defendant in the time allowed by law, to answer under oath the following questions and requests:

1. State the name(s), business address(es) and job title(s) or capacity(ies) of the officer(s), employee(s) or agent(s) answering or providing any information used to answer each Interrogatory.
2. State the correct legal name of your organization and the type of business entity.
3. State any other names that your organization uses to identify itself, whether such names are registered with any official, and the date and place of such registration.
4. State the name, title, address and job description of each director, partner, (general or limited), shareholder, employee, officer, and/or manager of Defendant who authorized or approved filing of the lawsuit filed against the state court defendants (Plaintiff herein) in the Circuit Court action in Russell County Alabama bearing CV 05-516.
5. Identify and describe any documents, handbooks, policy manuals, memorandum, or any other writings used to describe, depict, record, or establish Defendant's collection methods and collection techniques used in the collection of consumer accounts.
6. Identify by index listing, (including the title, author, subject, and date of creation) of any reports, memoranda, collection notices or other mailings for collection, used by Defendant to collect debt purchased or owned by Defendant or otherwise used by Defendant in its collection activities.

7. Is Defendant affiliated with any other organization (e.g., common ownership, overlapping offices or managers or common facilities or employees)? If so, describe the affiliation and identify the participants.
8. Identify all present and past contracts or agreements between Defendant and the original creditor of Plaintiff Gregory Ruth and give the date of the initial contract or agreement with the creditor. Include a history of the assignment of the account to the Defendant.
9. Identify the terms of the agreement between Plaintiff Gregory Ruth and the creditor pursuant to which Defendant sought to collect this account from the Plaintiff herein.
10. Describe any other business other than the collection of consumer accounts in which Defendant now engages or in the past have engaged.
11. Identify the attorney(s) in Alabama retained by Defendant to file collection suits during the last 4 calendar years.
12. Identify each document and other method of communication in which the Defendant authorizes an attorney to initiate lawsuits against consumers.
13. Identify each document and other method of communication in which employees or agents of the Defendant determines the statute of limitations before they authorize an attorney to initiate lawsuits against consumers.
14. Identify by name, job title and current employment status (employed or terminated, etc) each account manager, account collector or employee who worked in any capacity on the account being collected against Gregory Ruth. Include those employees from the initial receipt of the account at The Cadle Company until the present day.
15. Identify by caption, court, civil action number and result all litigation filed against the Defendant in the State of Alabama from 2000 to present.
16. If your response to the Requests for Admissions served simultaneously herewith is anything other than an unqualified admission, then please state herein, as to each such denial, the specific facts forming the basis for such denial and identify each witness and document upon which you will rely to support your denial.
17. Describe, step-by-step, the process by which you determined the state court action was not beyond the applicable statute of limitations prior to its filing.
18. State with specificity the Alabama statute of limitations code section upon which you rely and any case law as well.
19. State with specificity the name of the person, job title, and current mailing address and telephone number of the person who made the decision to bring the civil action in Russell County Alabama against Gregory Ruth.

20. List the legal names and job titles of all current or former employees, from 2000 until present of the Defendant who reports to any credit reporting agency or bureau, any updated or changed information on debtors for the accounts being collected in any of the rooms at the Cadle Building in Newton Falls Ohio.
21. List the legal names and job titles of all current or former employees, from 2000 until present of the Defendant who requests any information on debtors from any credit reporting agency on the accounts being collected in any of the rooms at the Cadle Building in Newton Falls Ohio.
22. List the legal names and job titles of all current or former employees, from 2000 until present of the Defendant who have worked in a the computer support, system support or accounting department for the Defendant at the Cadle Building in Newton Falls Ohio.
23. List the legal names, current job titles and identity (by name or location) of the room wherein they work, for each account manager or collection supervisor of the Defendant from 2000 until present.
24. List the name and job title of any employee of The Cadle Company who has given a deposition in a civil action that involved collection activities or an allegation of the violation of the Fair Debt Collection Practices Act by The Cadle Company or any of its affiliates.
25. Provide the full style of case, jurisdiction and venue where filed, names of legal counsel and the civil action number, for all litigation filed against The Cadle Company for any claims of the violation of the Fair Debt Collection Practices Act from 2002 until present.

This Request shall be deemed continuing so as to require further and supplemental production if defendant obtains additional documents required to be produced between the time of the initial production and the time of trial.

Respectfully Submitted,

/s/ Gerald A. Templeton
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Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of August 2007, I served by Electronic Transmission and via First-Class mail, postage prepaid, a true and correct copy of the foregoing document to the following parties:

Jack R. Thompson, Jr., Esq.
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/s/ Gerald A. Templeton
OF COUNSEL